

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Tina M. White, et al.

*

*On behalf of herself and
others similarly situated*

*

*

Plaintiffs

*

v.

Case No. 18-cv-02900-DLB

*

LLPD LLC, et al.

*

Defendants

**JOINT MOTION TO APPROVE SETTLEMENT AGREEMENT
AND GENERAL RELEASE AND ESTABLISH A SCHEDULE FOR THE
DISMISSAL OF THIS CASE WITH PREJUDICE**

The parties jointly move that the Court approve the attached Settlement Agreement and General Release, the Payment Plan (Exhibit A), and the Confessed Judgment Promissory Note (Exhibit B), (collectively, the “Settlement Agreement”), and schedule the dismissal of this case with prejudice no later thirty (30) days after Plaintiffs and their counsel have received all of the required payments for Month 1 under the Settlement Agreement as set forth below. In support of this Motion, the parties state as follows:

1. The parties conducted discovery and fully exchanged information, including payroll and hour of work records, prior to the mediation on November 16, 2020.
2. The Settlement Agreement was reached in mediation before Magistrate Judge Deborah L. Boardman. Each side was represented by experienced counsel.
3. The Settlement Agreement reached is reasonable and fair, considering the facts and issues in controversy. The Court is fully aware of the facts and legal issues, having presided over settlement negotiations.

4. The settlement of Plaintiffs' damages was reached independently and prior to the settlement of Plaintiffs' attorneys' fees and costs.

5. Pursuant to Section 4 of the Settlement Agreement, the parties request that the Court not dismiss this lawsuit until thirty (30) days after Plaintiffs and their counsel have received all of the required payments for Month One (1) under the Settlement Agreement. After this first payment is made, the parties shall file the Stipulation of Dismissal with Prejudice attached hereto as Exhibit 1, but the Settlement Agreement requests that the Court maintain continuing jurisdiction to enforce the terms of this Agreement, following the dismissal of this Lawsuit by the Court, including but not limited to enforcing the Promissory Note and Confessed Judgment attached as Exhibit B to the Settlement Agreement.

Wherefore, the parties respectfully request that the Court grant the Joint Motion To Approve Settlement Agreement And General Release And Establish A Schedule For The Parties To Dismiss The Case With Prejudice and enter the proposed Order.

Respectfully submitted,

/s/ (with permission)

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Counsel for Defendants

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
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*

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Plaintiffs

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v.

Case No. 18-cv-02900-DLB

*

LLPD LLC, et al.

*

Defendants

/

**STIPULATION OF DISMISSAL
WITH PREJUDICE**

Counsel for Plaintiffs and the Defendants agree and stipulate, pursuant to Fed. R. Civ. P. 41(a)(1)(ii) to a dismissal of all claims in this case, with prejudice, and with each party to bear its own costs, if any, associated with their claims.

Respectfully submitted,

/s/ (with permission)
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